

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA 3:22-cr-00085-HZ

v. INFORMATION

TORI LYNN HEAD, 18 U.S.C. § 1349
Defendant. 21 U.S.C. §§ 331(k) and 333(a)(2)

THE UNITED STATES ATTORNEY CHARGES:

COUNT 1
(Conspiracy to Commit Wire Fraud)
(18 U.S.C. § 1349)

Beginning in or about November 2019 and continuing through in or about January 2021, in the District of Oregon and elsewhere, defendant Tori Lynn Head and others knowingly conspired, combined, confederated, and agreed with each other to, and did, commit wire fraud in violation of 18 U.S.C. § 1343.

Manner and Means of the Conspiracy and Scheme to Defraud

Defendant Tori Lynn Head and others used the following manner and means to carry out the conspiracy and scheme to defraud:

- Beginning in or about November 2019, defendant Tori Lynn Head and others started Woofin Palooza, a self-described rescue, rehabilitation, boarding, and pet adoption

organization with facilities in Multnomah County and Columbia County, Oregon.

They started the business in November 2019 and were obtaining pets with medical and behavioral issues from out-of-state, so-called kill shelters.

- From at least December 2019 through January 2021, on more than 280 occasions, defendant Tori Lynn Head and others made material misrepresentations about the health and behavior of animals to customers.
- Based on these material misrepresentations and others, customers paid Woofin Palooza either by credit card or check, adoption fees totaling more than \$82,000.
- Others at Woofin Palooza charged some customers so-called “appointment fees”, which totaled more than \$3,475, in order to see the pets for adoption, claiming the fee was necessary to obtain the pets from boarders and other reasons. The “appointment fee” was a sham.
- Because many of these animals were in fact sick or suffered from behavioral issues, they required additional veterinary care that totaled more than \$142,580.
- Defendant Tori Lynn Head and others at Woofin Palooza also required customers to pay more than \$23,000 in spay and neuter fees, claiming they would reimburse the customers once the pets were spayed or neutered. That did not happen. In many circumstances, defendant Tori Lynn Head and others used lulling tactics to avoid returning the deposits.
- Between in or about November 2019 and continuing through in or about January 2021, defendant and others used, or caused to be used, interstate wires in furtherance of his scheme to defraud, including phone calls, text messages, email

communications, and transfers of money via wire, with each use of interstate wires being a separate execution of the above-described scheme to defraud.

In violation of 18 U.S.C. § 1349.

COUNT 2

(Food Drug and Cosmetic Act—Dispensing Animal Drugs Without Proper Labeling)
(21 U.S.C. §§ 331(k) and 333(a)(2))

Beginning in or about November 2019 and continuing through in or about January 2021, in the District of Oregon and elsewhere, defendant Tori Lynn Head, with the intent to defraud, did or caused the alteration, mutilation, destruction, obliteration, or removal of the whole or any part of the labeling of, or the doing of any other act with respect to drugs while such drugs were held for sale after shipment in interstate commerce which resulted in such articles being adulterated or misbranded.

In violation of 21 U.S.C. §§ 331(k) and 333(a)(2).

Dated: March 10, 2022

Respectfully submitted,

SCOTT ERIK ASPHAUG
United States Attorney

/s/ Scott E. Bradford
SCOTT E. BRADFORD, OSB #062824
Assistant United States Attorney